

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

JOLEEN K. YOUNGERS,
as the Personal Representative of the
Wrongful Death Estate of Roxsana Hernandez,

Plaintiff,

v.

1:20-cv-0465 WJ/JMR
Consolidated with 1:21-cv-0620 WJ/JMR

LASALLE CORRECTIONS TRANSPORT LLC,
LASALLE CORRECTIONS WEST LLC,
LASALLE MANAGEMENT COMPANY LLC,
GLOBAL PRECISION SYSTEMS LLC,
TRANSCOR AMERICA LLC,
CORECIVIC, INC., AND
UNITED STATES OF AMERICA,

Defendants,

and

GLOBAL PRECISION SYSTEMS, LLC,

Third-Party Plaintiff,

v.

ASSET PROTECTION AND SECURITY SERVICES, L.P.,

Third Party Defendant.

STIPULATION OF DISMISSAL OF CLAIMS AGAINST THE UNITED STATES

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff Jolene K. Youngers, as the Personal Representative of the Wrongful Death Estate of Roxsana Hernandez, and Defendant United States of America, through their undersigned counsel, hereby stipulate and agree that all claims against the United States in the above-captioned case have been settled and are dismissed with prejudice, with each party to bear its own costs and attorney fees. No other claims asserted by Plaintiff in the above-captioned case are affected by this stipulation.

Respectfully submitted,

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Approved via email by Daniel Yohalem
on 1/23/25

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 24, 2025, I filed the foregoing pleading electronically through the CM/ECF system, which caused all parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

Brett C. Eaton
BRETT C. EATON
Assistant United States Attorney